

Atlanta  
Beijing  
Brussels  
Hong Kong  
London  
Los Angeles  
Milan  
New York  
Orange County  
Palo Alto  
Paris  
San Diego  
San Francisco  
Shanghai  
Stamford  
Tokyo  
Washington, DC

(202) 551-1729  
larrysidman@paulhastings.com

May 20, 2005

**ELECTRONICALLY FILED**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Requirements for Digital Television Receiving Capability  
ET Docket No. 05-24

Dear Ms. Dortch:

On behalf of TTE Corporation, manufacturer of RCA television products, on May 19, 2005 Lawrence Sidman and David Siddall, of Paul, Hastings, Janofsky & Walker LLP, met with Jordan Goldstein, Senior Legal Advisor to Commissioner Copps; Matthew Brill, Senior Legal Advisor to Commissioner Abernathy; and Rudy Brioché, Legal Advisor to Commissioner Adelstein, concerning issues raised in the above-referenced proceeding. During these meetings we discussed the points made by TTE in its Reply Comments submitted in support of the proposals in the Commission's *Notice of Proposed Rulemaking* to accelerate to March 1, 2006, the date which all mid-sized television receivers must include a digital tuner and to delete the associated 50-percent requirement that otherwise will become effective on July 1, 2005.

TTE emphasized that the most important aspect of a successful transition to DTV is certainty, and that the 50-percent requirement creates enormous uncertainty in the marketplace that is counterproductive to increasing sales of television sets with digital tuners. TTE's experience with the current 50 percent requirement applicable to television receivers of screen sizes 36" and greater is that the uncertainty it creates undercuts the Commission's stated goal of accelerating sales of television sets with DTV tuners. In contrast, a 100 percent requirement provides the certainty needed by consumers to purchase sets with DTV tuners. The most rapid way forward is to repeal the 50 percent requirement for television sets with screen sizes 25-36" and move the 100 percent requirement up to the earliest time consistent with manufacturers' abilities to produce sets in the required quantities, which at this late date is March 1, 2006.

Ms. Marlene H. Dortch

May 20, 2005

Page 2

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being filed in the above docket and copied by email to each Commission participant.

Respectfully submitted,

A handwritten signature in black ink, reading "Lawrence R. Sidman". The signature is written in a cursive, flowing style.

Lawrence R. Sidman  
of PAUL, HASTINGS, JANOFSKY & WALKER LLP  
Counsel to TTE Corporation

cc: Jordan Goldstein, Senior Legal Advisor to Commissioner Copps  
Matthew Brill, Senior Legal Advisor to Commissioner Abernathy  
Rudy Brioché, Legal Advisor to Commissioner Adelstein